

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 1:23-cr-40

v.

HON. JANE M. BECKERING
United States District Judge

JOHN DAWOOD DALALY,

Defendant.

_____ /

UNITED STATES' MOTION FOR A DOWNWARD DEPARTURE

For the reasons set forth in the accompanying brief, the United States moves for a two-level downward departure from defendant John Dalaly's final advisory range of imprisonment under the United States Sentencing Guidelines, as computed by the Court, pursuant to Guidelines § 5K1.1. This motion is based upon the substantial assistance he has provided law enforcement in the investigation and prosecution of the bribery case in which Dalaly participated.

Pursuant to LCrR 12.4, counsel for the government conferred with defense counsel prior to filing this motion. Defense counsel indicated that while he does not oppose the motion, he reserves the right to argue for a greater or different departure than recommended by the government.

Respectfully submitted,

MARK A. TOTTEN
United States Attorney

Dated: August 31, 2023

/s/ Clay Stiffler
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